

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STEPHEN GRAY, individually and on	:	
behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 9790 (SHS)
v.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.,	:	
THE 401(k) INVESTMENT	:	
COMMITTEE, and JOHN DOES 1 - 20,	:	
	:	
Defendants.	:	
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SHAUN ROSE, Individually and On	:	
Behalf of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10294
v.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.,	:	
THE 401(k) INVESTMENT	:	
COMMITTEE, and JOHN DOES 1 - 10,	:	
	:	
Defendants.	:	
-----x		
MEREDITH TRANBERG, individually	:	
and on behalf of all others similarly situated	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10341
v.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.,	:	
THE 401(k) INVESTMENT	:	
COMMITTEE, and JOHN DOES 1 - 20,	:	
	:	
Defendants.	:	
-----x		

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 ANTON RAPPOLD, individually and on behalf of all others similarly situated, :
 Plaintiff, : Civil Action No: 07 Civ. 10396
 v. :
 CITIGROUP INC., CITIBANK, N.A., :
 CHARLES PRINCE, THE PLANS :
 ADMINISTRATIVE COMMITTEE OF :
 CITIGROUP INC., THE 401(k) :
 INVESTMENT COMMITTEE, and JOHN :
 and JANE DOES 1 - 10, :
 Defendants. :
 -----x
 SAMIER TADROS, on Behalf of All :
 Others Similarly Situated, :
 Plaintiff, : Civil Action No: 07 Civ. 10442
 v. :
 CITIGROUP INC., CHARLES O. :
 PRINCE, C. MICHAEL ARMSTRONG, :
 ALAIN J.P. BELDA, GEORGE DAVID, :
 KENNETH T. DERR, JOHN M. DEUTCH, :
 ROBERTO HERNANDEZ RAMIREZ, :
 ANN DIBBLE JORDAN, KLAUS :
 KLEINFELD, ANDREW N. LIVERIS, :
 ANNE MULCAHY, RICHARD D. :
 PARSONS, JUDITH RODIN, ROBERT E. :
 RUBIN, ROBERT E. RUBIN, FRANKLIN :
 A. THOMAS, JOHN DOES 1-20 (BEING :
 CURRENT AND FORMER MEMBERS :
 OF THE PLANS ADMINISTRATIVE :
 COMMITTEE OF CITIGROUP INC.) :
 and JOHN DOES 21-40 (BEING :
 CURRENT AND FORMER MEMBERS :
 OF THE INVESTMENT COMMITTEE :
 OF THE CITIGROUP INC. 401(K) PLAN), :
 Defendants. :
 -----x

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STEPHAN FIORINO, individually and on behalf of all others similarly situated, :

Plaintiff, : Civil Action No: 07 Civ. 10458
v. :

CITIGROUP INC., CITIBANK N.A.,
CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF
CITIGROUP INC., THE 401(k)
INVESTMENT COMMITTEE, and
JOHN DOES 1 - 20, :

Defendants. :

-----x
JAMES BOLLA, individually and on behalf of all others similarly situated, :

Plaintiff, : Civil Action No: 07 Civ. 10461
v. :

CITIGROUP INC., CITIBANK N.A.,
CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF
CITIGROUP INC., THE 401(k)
INVESTMENT COMMITTEE, and
JOHN DOES 1 - 20, :

Defendants. :

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MARK GEROULO, individually, on behalf :
of the CITIGROUP 401(k) Plan, the :
CITIBUILDER 401 (K) PLAN FOR :
PUERTO RICO, and all others similarly, :
:
Plaintiff, : Civil Action No: 07 Civ. 10472
v. :
:
CITIGROUP, INC., CITIBANK, N.A., :
THE PLAN ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
MICHAEL E. SCHLEIN, JOHN DOES :
1-10, THE CITIGROUP 401(k) PLAN :
INVESTMENT COMMITTEE and JOHN :
DOES 10-20, C. MICHAEL :
ARMSTRONG, ALAN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ, ANN DIBBLE JORDAN, :
ANDREW N. LIVERIS, DUDLEY C. :
MECUM, ANNE M. MULCAHY, :
RICHARD D. PARSONS, ANDRALL E. :
PEARSON, CHARLES PRINCE, JUDITH :
RODIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, SANFORD I. WEILL, :
:
Defendants. :
-----X

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 ALAN STEVENS, on Behalf of Himself :
 and All Others Similarly Situated, :
 :
 Plaintiff, : Civil Action No: 07 Civ. 11156
 v. :
 :
 CITIGROUP INC., CITIBANK, N.A, :
 CHARLES PRINCE, C. MICHAEL :
 ARMSTRONG, ALAIN J.P. BELDA, :
 GEORGE DAVID, KENNETH T. DERR, :
 JOHN M. DEUTCH, PETER JOHNSON, :
 ROBERTO HERNANDEZ RAMIREZ, :
 ANDREW N. LIVERIS, ANNE :
 MULCAHEY, RICHARD D. PARSONS, :
 JUDITH RODIN, ROBERT E. RUBIN, :
 ROBERT L. RYAN, FRANKLIN A. :
 THOMAS, THE PLANS :
 ADMINISTRATION COMMITTEE OF :
 CITIGROUP, INC., THE INVESTMENT :
 COMMITTEE and JOHN DOES 1-30, :
 :
 Defendants. :
 -----X
 STEPHEN GOLDSTEIN, on Behalf of :
 Himself and a Class of Persons Similarly :
 Situated, :
 :
 Plaintiff, : Civil Action No: 07 Civ. 11158
 v. :
 :
 CITIGROUP INC., THE PLANS :
 ADMINISTRATION COMMITTEE OF :
 CITIGROUP, INC., MICHAEL E. :
 SCHLEIN, CHARLES PRINCE, C. :
 MICHAEL ARMSTRONG, ALAIN J.P. :
 BELDA, GEORGE DAVID, KENNETH T. :
 DERR, JOHN M. DEUTCH, ROBERTO :
 HERNANDEZ RAMIREZ, ANDREW N. :
 LIVERIS, ANNE MULCAHEY, :
 RICHARD D. PARSONS, JUDITH :
 RODIN, ROBERT E. RUBIN, ROBERT L. :
 RYAN, AND FRANKLIN A. THOMAS, :
 And JOHN DOES 1-30, :
 :
 Defendants.

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CHRIS SOUTHARD, on Behalf of All	:	
Others Similarly Situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11164
v.	:	
	:	
CITIGROUP INC., CHARLES O.	:	
PRINCE, C. MICHAEL ARMSTRONG,	:	
ALAIN J.P. BELDA, GEORGE DAVID,	:	
KENNETH T. DERR, JOHN M. DEUTCH,	:	
ROBERTO HERNANDEZ RAMIREZ,	:	
ANN DIBBLE JORDAN, KLAUS	:	
KLEINFELD, ANDREW N. LIVERIS,	:	
ANNE MULCAHY, RICHARD D.	:	
PARSONS, JUDITH RODIN, ROBERT E.	:	
RUBIN, ROBERT E. RUBIN, FRANKLIN	:	
A. THOMAS, JOHN DOES 1-20 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.)	:	
and JOHN DOES 21-40 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE INVESTMENT COMMITTEE	:	
OF THE CITIGROUP INC. 401(K) PLAN),	:	
	:	
Defendants.	:	

FRANCIA BRICK, individually and on	:	
Behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11369
v.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
THE PLAN'S ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP, INC.,	:	
THE 401(k) INVESTMENT COMMITTEE,	:	
And JOHN DOES 1-10,	:	
	:	
Defendants.	:	

**PLAINTIFFS SHAUN ROSE AND MARK GEROULO'S SUPERSEDING MOTION
FOR CONSOLIDATION OF RELATED ACTIONS AND APPOINTMENT OF
INTERIM LEAD PLAINTIFFS, CO-LEAD COUNSEL AND LIAISON COUNSEL**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on January 17, 2008, at 4:00 p.m., or as soon thereafter as the matter may be heard, Plaintiffs Shaun Rose and Mark Geroulo (the "Rose Plaintiffs"), by their undersigned counsel, will move the Court to consolidate related actions, appoint Interim Lead Plaintiffs, Interim Co-Lead Counsel and Interim Liaison Counsel. In support of their motion, the Rose Plaintiffs aver as follows:

1. Currently pending before the Court are several class actions seeking relief on behalf of the Citigroup Corporation 401(k) Plan and the Citibuilder 401(k) Plan for Puerto Rico (the "Plans"), and overlapping classes of participants and beneficiaries of the Plans, that detail alleged breaches of fiduciary duty by Citigroup, Inc. and other alleged fiduciaries of the Plans pursuant to the Employee Retirement Income Security Act of 1974 ("ERISA") with regard to the Plans investment in Citigroup, Inc. stock during the relevant time period.

2. Because the above-captioned actions contain many common questions of law and fact, and in the interest of avoiding unnecessary cost and delay, they should be consolidated for all purposes pursuant to Fed. R. Civ. P. 42(a).

3. Additionally, in accordance with this Court's Order dated December 20, 2007 and pursuant to Fed. R. Civ. P. 23(g) and the MANUAL FOR COMPLEX LITIGATION (4th ed. 2004), the Rose Plaintiffs move for the entry of proposed Pretrial Order No. 1, which provides for the appointment of Shaun Rose and Mark Geroulo as Interim Lead Plaintiffs, the appointment of Schiffren Barroway Topaz & Kessler, LLP and Schatz Nobel Izard, P.C. as Interim Co-Lead Counsel, and the appointment of Dealy & Silberstein, LLP as Interim Liaison Counsel.

In support of their Motion, the Rose Plaintiffs submit herewith a Memorandum in Support, the Declarations of Joseph H. Meltzer and Robert A. Izard, and Proposed Pretrial Order No. 1.

Dated: December 26, 2007

DEALY & SILBERSTEIN, LLP



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Proposed Interim Liaison Counsel

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Proposed Interim Co-Lead Counsel